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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X **Case No. 07 Civ 6627 (BSJ)**
**PROCAPUI-PRODUCTORES DE CAMAROES
DE ICAPUI LTDA.,**

Plaintiffs,

-against-

**RULE 26 INITIAL
DISCLOSURE**

**MARCIAL GERALD LAYANI, G.F. HIGGINS
INC., THERESA HIGGINS as Executrix of
THE ESTATE OF GERALD FRANCIS HIGGINS
THOMAS HIGGINS, ROBERT HIGGINS,
RICHARD RUBIN and NOEL BLACKMAN,**

Defendants.

-----X

Defendant RICHARD RUBIN, by his undersigned counsel, hereby provides
initial disclosure required by Fed. R. Civ. P. 26(a)(1):

A. The name and, if known, the address and telephone number of each
individual likely to have discoverable information that the disclosing party may use to
support its claims or defenses, unless solely for impeachment, identifying the subjects of
the information.

1. Defendant Richard Rubin
c/o Lawrence R. Loneragan, P.C.
275 Seventh Avenue, 25th Floor
New York, NY 10001

212-206-9071

Subjects of Information: Allegations in Plaintiff's Complaint.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

1. None available or identifiable at present.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

1. Defendants claims no damages.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. None.

Plaintiff reserves the right to supplement this disclosure pursuant to Fed. R. Civ. P. 26(e).

Dated: November 16, 2007
New York, New York

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By: /S/
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On Behalf of Defendant
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Rule 26 Initial Disclosure was caused to be served upon the following attorneys:

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electronically to their respective e-mail addresses and by enclosing said documents in a postpaid sealed wrapper properly addressed to said attorneys and depositing same in an official depository under exclusive care and custody of the United States Postal Service within New York State, this 16th day of November, 2007.

Lawrence R. Lonergan [LL-4744]